



Application granted. Strict compliance with Rule 4(E) of this Court's Individual Practices is required.

The conference currently scheduled for September 24, 2020 is adjourned sine die.

The Clerk is respectfully directed to terminate the event at Doc. 94.

SO ORDERED.

Philip M. Halpern  
United States District Judge

Dated: New York, New York  
September 18, 2020

LETITIA JAMES  
ATTORNEY GENERAL

**BY ECF**

Hon. Philip M. Halpern  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Constant v. Dapcevic, 16-cv-3985 (PMH)

Dear Judge Halpern:

This Office represents Defendants Nedzad Dapcevic, Brian Sturtevent, Antonio Alban, Ronald Cabral, Jonathan Markwick, Brian Hess, and Michael Venerro (“Defendants”) in the above-referenced action. I write, with the consent of Plaintiff’s counsel, to respectfully set deadlines for the parties’ exchange of Local Civil Rule 56.1 statements and to adjourn the status conference scheduled for September 24, 2020. This is the first such request of this kind.

In accordance with Judge McCarthy’s directive, Defendants confirmed that all discovery in this matter was complete on August 31, 2020 (ECF 92) and Judge McCarthy closed her reference on September 8, 2020 (ECF 93). Defendants anticipate moving for summary judgment and Your Honor’s Individual Rules require the exchange of the parties’ Statements of Material Facts prior to a movant’s filing a request for a pre-motion conference. Counsel have conferred and respectfully request that the Court set the following schedule: Defendants’ 56.1 Statement to be provided to Plaintiff by October 14, 2020; Plaintiff’s response to be provided to Defendants by November 16, 2020; and Defendants’ pre-motion letter to be filed by November 30, 2020. Considering these requested deadlines, the parties also respectfully request that the Court convert its recently scheduled status conference, which is currently scheduled for September 24, 2020, into a pre-motion conference following the submission of the parties’ pre-motion and response letters. Counsel are generally available in December for this conference.

Thank you for your consideration of the applications herein.

Respectfully submitted,

/s/ Deanna L. Collins

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cc: Counsel of Record (by ECF)